

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

AN ELECTRONIC EXAMINATION BY THE)	
PUBLIC SERVICE COMMISSION OF THE)	
ENVIRONMENTAL SURCHARGE)	
MECHANISM OF KENTUCKY UTILITIES)	
FOR THE SIX-MONTH BILLING PERIODS)	CASE NO. 2025-00172
ENDING APRIL 30, 2024 AND OCTOBER 31,)	
2024, AND FOR THE TWO-YEAR BILLING)	
PERIOD ENDING APRIL 30, 2025)	

DIRECT TESTIMONY OF

ANDREA M. FACKLER
MANAGER, REVENUE REQUIREMENT/COST OF SERVICE
LG&E AND KU SERVICES COMPANY

Filed: July 24, 2025

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Andrea M. Fackler**, being duly sworn, deposes and says that she is Manager – Revenue Requirement/Cost of Service for Kentucky Utilities Company, an employee of LG&E and KU Services Company, that she has personal knowledge of the matters set forth in the foregoing testimony, and that the answers contained therein are true and correct to the best of her information, knowledge, and belief.

Andrea M. Fackler
Andrea M. Fackler

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 23rd day of July 2025.

Caroline J. Davison (SEAL)
Notary Public

Notary Public ID No. KYNP63286

My Commission Expires:

January 22, 2027



1 **Q. Please state your name, title, and business address.**

2 A. My name is Andrea M. Fackler. I am the Manager, Revenue Requirement/Cost of
3 Service for Kentucky Utilities Company (“KU” or “Company”) and an employee of
4 LG&E and KU Services Company, which provides services to KU. My business
5 address is 2701 Eastpoint Parkway, Louisville, Kentucky, 40223. A complete
6 statement of my education and work experience is attached to this testimony as
7 Appendix A.

8 **Q. Have you previously testified before this Commission?**

9 A. Yes. I have previously submitted testimony and sponsored data responses to the
10 Kentucky Public Service Commission (“Commission”) in the Company’s past six-
11 month and two-year Environmental Cost Recovery (“ECR”) Surcharge reviews¹. I
12 have also previously submitted testimony in the Company’s 2020 ECR Compliance
13 Plan and pending 2025 ECR Compliance Plan proceedings².

14 **Q. What is the purpose of this proceeding?**

15 A. The purpose of this proceeding is to review the past operation of KU’s ECR Surcharge
16 during the six-month billing periods ending April 30, 2024 and October 31, 2024 as
17 well as the two-year billing period ending April 30, 2025 and determine whether the
18 surcharge amounts collected during the period are just and reasonable.

¹ See, e.g., *An Electronic Examination by the Public Service Commission of the Environmental Surcharge Mechanism of Kentucky Utilities Company for the Six-Month Billing Periods Ending April 30, 2020, October 31, 2020, October 31, 2021, April 30, 2022, October 31, 2022, and October 31, 2023, and for the Two-Year Billing Periods Ending April 30, 2021, and April 30, 2023*, Case No. 2023-00376, Direct Testimony of Andrea M. Fackler (Feb. 14, 2024).

² See, e.g., *Electronic Application of Kentucky Utilities Company for Approval of Its 2020 Compliance Plan for Recovery by Environmental Surcharge*, Case No. 2020-00060, Direct Testimony of Andrea M. Fackler (Mar. 31, 2020); *Electronic Application of Kentucky Utilities Company for Approval of Its 2025 Compliance Plan for Recovery by Environmental Surcharge*, Case No. 2025-00105, Direct Testimony of Andrea M. Fackler (Apr. 30, 2025).

1 **Q. What is the purpose of your testimony?**

2 A. The purpose of my testimony is to summarize the operation of KU's ECR Surcharge
3 during the Review Period, explain how the Environmental Surcharge Billing Factors
4 were calculated during the Review Period, propose changes to the ES Forms, correct
5 any operating expenses or rate base data from previously filed ES Reports, reflect
6 actual changes in the overall rate of return on capital, demonstrate that the amount
7 collected during the period was just and reasonable, and present and discuss KU's
8 proposed adjustment to the ECR Surcharge Revenue Requirement to reconcile past
9 surcharges with actual costs recoverable and its impact on a residential customer.
10 Finally, my testimony will recommend an updated overall rate of return on capital to
11 be used for all ECR Compliance Plans in the ES Reports upon the Commission's Order
12 in this proceeding.

13 **Q. Are you sponsoring any exhibits?**

14 A. Yes. I am sponsoring two exhibits identified as Exhibit AMF-1 and AMF-2:

- 15 • Exhibit AMF-1: Current Monthly ES Forms 3.00 and 3.10 and
- 16 • Exhibit AMF-2: Proposed Monthly ES Forms 3.00 and 3.10.

17 **Q. Please summarize the operation of the ECR Surcharge for the billing periods**
18 **included in this review.**

19 A. KU billed an ECR Surcharge to its customers from May 1, 2023 through April 30, 2025
20 to collect (or refund) any difference between its ECR Surcharge Revenue Requirement
21 and the ECR Surcharge revenues collected through base rates during the applicable
22 expense period. For purposes of the Commission's examination in this case, the
23 monthly KU ECR Surcharge amounts are for the billing periods from November 2023

1 to April 2025 (the May 2023 to October 2023 billing periods were reviewed with Case
2 No. 2023-00376). In each month of the billing periods under review in this proceeding,
3 KU calculated the Environmental Surcharge Billing Factors in accordance with its ECR
4 Surcharge Tariff and the requirements of the Commission's previous orders concerning
5 KU's ECR Surcharge. The calculations were made in accordance with the
6 Commission-approved monthly forms (hereinafter referred to as "ES Forms" for the
7 approved templates or as "ES Reports" for the monthly data filed with the Commission)
8 and filed with the Commission ten days before the new monthly factor was billed by
9 the Company.

10 **Q. Please explain the distinction between billing periods and expense periods.**

11 A. The expense period is the calendar month in which the Company incurs approved ECR
12 Surcharge costs. The Company prepares monthly ES Reports on an expense month
13 basis to file with the Commission. As previously discussed, the ECR Surcharge is
14 determined in the monthly ES Report and billed (or refunded) to customers in the
15 second month following the expense month. This is the billing period. References to
16 expense periods and billing periods may be used interchangeably throughout my
17 testimony, but each period is referring to the same six months of data regardless of
18 whether referred to as an expense period or billing period.

19 **Q. What costs were included in the calculation of the Environmental Surcharge**
20 **Billing Factors for the billing periods under review?**

21 A. The capital and operating costs included in the calculation of the Environmental
22 Surcharge Billing Factors for the Review Period were the September 2023 through
23 February 2025 expense period costs KU incurred in conjunction with its approved ECR

1 Compliance Plans, as detailed in the attachment to the response to Question No. 2 of
2 the Commission Staff's First Request for Information, incorporating all required
3 revisions.

4 The monthly Environmental Surcharge Billing Factors applied during the
5 billing period under review were calculated consistent with the Commission's Orders
6 in KU's previous applications to assess or amend its ECR Surcharge mechanism and
7 plan, as well as, Orders issued in previous review cases. The monthly ES Reports filed
8 with the Commission during this time reflect the various changes to the ES Forms
9 ordered by the Commission from time to time.

10 **Q. Please describe the most recently approved changes to KU's ECR Compliance**
11 **Plans.**

12 A. In Case No. 2020-00060, the Commission approved KU's 2020 ECR Compliance Plan
13 that included two new projects and associated operation and maintenance costs.
14 Pursuant to the Commission's September 29, 2020 Order approving KU's 2020 ECR
15 Compliance Plan, KU began including the approved projects in the monthly ES Report
16 for the September 2020 expense month with separate authorized rates of return for the
17 Pre-2020 and 2020 ECR Compliance Plans.

18 In KU's most recent base rate case (Case No. 2020-00349), the Commission
19 approved the Company's proposed elimination of all Eligible Pollution Control capital
20 costs and related O&M associated with Projects 28-31 and 34-38 (from KU's 2009,
21 2011, and 2016 ECR Compliance Plans) from the ECR Surcharge mechanism effective
22 July 1, 2021.

1 Additionally, KU currently has a proceeding before the Commission for
2 approval of cost recovery of its 2025 ECR Compliance Plan, a selective catalytic
3 reduction (SCR) system for Unit 2 of its Ghent Generating Station.³ The proposed
4 2025 ECR Compliance Plan does not impact the periods under review in this
5 proceeding.

6 **Q. Please describe the most recently approved changes to the operation of the ECR**
7 **Surcharge mechanism.**

8 A. The most recent change was approved in the Company's last ECR Surcharge review,
9 Case No. 2023-00376. The Commission approved the continuation of a 9.35% return
10 on equity to be used in the monthly ES Reports for all ECR Compliance Plans. The
11 Commission also approved changes to the Company's cash working capital calculation
12 on ES Form 2.40 removing net beneficial reuse revenues and expenses. Finally, the
13 Commission approved the immediate inclusion of all beneficially reused coal
14 combustion residual revenues and expenses on ES Form 2.60, streamlining the
15 collection/return of beneficial reuse revenues/expenses for customers during the
16 expense month in which they occur.

17 **Q. Is KU proposing any changes to its ECR Surcharge tariff?**

18 A. No, the Company is not proposing any changes to its ECR Surcharge tariff in this
19 proceeding. However, the Company has proposed minor revisions to its ECR Surcharge
20 tariff in its April 30, 2025 application for approval its 2025 ECR plan and May 30, 2025

³ *Electronic application of Kentucky Utilities Company and Louisville Gas and Electric Company for Certificates of Public Convenience and Necessity and Site Compatibility Certificates – Case No. 2025-00045.*

1 application for an adjustment of its electric base rates^{4,5}. The proposed tariff revisions
2 do not impact the periods under review in this proceeding.

3 **Q. Is KU proposing any changes to the currently approved ES Forms?**

4 A. Yes. As mentioned above, the Company has proposed ECR Surcharge tariff changes
5 in its pending application for an adjustment of its electric rates. In addition to minor
6 clarifying language revisions that do not impact the operation of the ECR Surcharge
7 mechanism, the Company is proposing the ECR Surcharge tariff be updated to reflect
8 the Company's Retired Asset Recovery (RAR) rider and proposed Renewable Power
9 Purchase Agreement (RPPA) adjustment clause. The revenues for both should be
10 included in the determination of the Jurisdictional Allocation Factor and the respective
11 Group Environmental Surcharge billing factors⁶. To incorporate these changes into the
12 ES Forms, the Company is proposing the following:

- 13 • ES Form 3.00 – The update of Column (4) to “Fuel Clause Revenues Including
14 Off-System Sales Tracker and RPPA” to allow the inclusion of any RPPA
15 amounts. Also, the addition of Column (6) for “Retired Asset Recovery
16 Revenues” to show the RAR revenues in the Group 1 and Group 2 revenue
17 calculations.
- 18 • ES Form 3.10 – The update of Line (2) to “Fuel Adjustment Clause including
19 Off System Sales Tacker and RPPA” to allow inclusion of RPPA revenues into
20 the jurisdictional allocation. Also. The addition of Line (4) “Retired Asset

⁴ *Electronic Application of Kentucky Utilities Company for Approval of Its 2025 Compliance Plan for Recovery by Environmental Surcharge*, Case No. 2025-00105, filed Apr. 30, 2025.

⁵ *Electronic application of Kentucky Utilities Company for an adjustment of its electric rates and approval of certain regulatory and accounting treatments* – Case No. 2025-00113 filed May 30, 2025.

⁶ *Electronic application of Kentucky Utilities Company for an adjustment of its electric rates and approval of certain regulatory and accounting treatments* – Case No. 2025-00113, direct testimony of Andrea M. Fackler at 35.

1 Recovery” to show the RAR revenues in the Company’s jurisdictional
2 allocation calculation.

3 **Q. Are there any changes or adjustments in Operating Expenses from the originally**
4 **filed expense months that KU is correcting in this review case?**

5 A. No, the Company has not identified any adjustments in Operating Expenses for the
6 periods under review that have not already been corrected through the filing of the
7 monthly ES Reports.

8 **Q. Are there any changes or adjustments in Rate Base from the originally filed**
9 **expense months that KU is correcting in this review case?**

10 A. No, the Company has not identified any adjustments in rate base for the periods under
11 review that have not already been corrected through the filing of the monthly ES
12 Reports.

13 **Q. Are there any other changes necessary to the jurisdictional revenue requirement**
14 **(E(m))?**

15 A. Yes. Adjustments to E(m) are necessary for compliance with the Commission’s Order
16 in Case No. 2000-00439, to reflect the actual changes in the overall rate of return on
17 capital that is used in the determination of the return on environmental rate base.

18 Pursuant to the terms of the Settlement Agreement approving the 2011 ECR
19 Compliance Plan, KU calculated the short- and long-term debt rate using average daily
20 balances and daily interest rates in the calculation of the overall rate of return true-up
21 adjustment for each six-month expense period of the Review Period. For the October
22 2023 through February 2024 expense months, the weighted average cost of capital was
23 based on the average daily balances for short- and long-term debt as of February 29,

1 2024 and the 9.35% authorized return on equity for all approved ECR Compliance
2 Plans at that time⁷. For the March 2024 through August 2024 expense months, the
3 weighted average cost of capital was based on the average daily balances for short- and
4 long-term debt as of August 31, 2024 and the 9.35% authorized return on equity for all
5 approved ECR Compliance Plans at that time⁸. For the September 2024 through
6 February 2025 expense months, the weighted average cost of capital was based on the
7 average daily balances for short- and long-term debt as of February 28, 2025 and the
8 9.35% authorized return on equity for all approved ECR Compliance Plans at that
9 time⁹. The details of and support for the overall rate of return calculations used to true-
10 up the return on environmental rate base are shown in the attachment to KU's response
11 to Question No. 1 of the Commission Staff's First Request for Information.

12 **Q. Are there any other corrections to information provided in the monthly ES**
13 **Reports during the Review Period that KU is correcting in this review case?**

14 A. No.

15 **Q. Are the amounts collected through the ECR Surcharge just and reasonable?**

16 A. Yes. The Company only includes costs in the ECR Surcharge that were incurred in
17 conjunction with Commission-approved ECR Compliance Plans. Any information
18 identified and corrected in a review case proceeding, such as the instant proceeding, or
19 through the filing of revised ES Reports with the Commission are due to various checks

⁷ *Electronic Application of Kentucky Utilities Company for an Adjustment of its Electric Rates, a Certificate of Public Convenience and Necessity to Deploy Advanced Metering Infrastructure, Approval of Certain Regulatory and Accounting Treatments, and Establishment of a One-Year Surcredit*, Case No. 2020-00349, Final Order Dated June 30, 2021.

⁸ *Id.*

⁹ *Id.*

1 and balances the Company has in place to ensure proper cost recovery through the ECR
2 Surcharge.

3 **Q. As a result of the operation of the ECR Surcharge during the billing periods under**
4 **review, is an adjustment to the revenue requirement necessary?**

5 A. Yes. KU experienced an over-recovery of \$553,476 for the Review Period. KU's
6 attachment to the response to Question No. 2 of the Commission Staff's First Request
7 for Information shows the calculation of the over-recovery. An adjustment to the ECR
8 Surcharge Revenue Requirement is necessary to reconcile the over-collection of past
9 ECR Surcharge revenues with actual costs for the Review Period.

10 **Q. Has KU identified the causes of the over-recovery during the billing period under**
11 **review?**

12 A. Yes. KU has identified the primary components that make up the over-recovery during
13 the Review Period. The primary components are: (1) changes in overall rates of return
14 as previously discussed and (2) the use of 12-month average revenues to determine the
15 billing factor. The details and support of the primary components that make up the
16 over-recovery during the Review Period are shown in the attachment to KU's response
17 to Question No. 2 of the Commission Staff's First Request for Information.

18 **Q. Please explain how the function of the ECR Surcharge mechanism contributes to**
19 **the recovery position in the billing period under review.**

20 A. The use of 12-month average revenues to calculate the monthly billing factors and then
21 applying those same billing factors to the actual monthly revenues will result in an
22 over- or under-collection of ECR Surcharge revenues. For illustrative purposes, the
23 table below shows a comparison of the 12-month average revenues used in the monthly

1 ES Reports to determine the Environmental Surcharge Billing Factors and the actual
2 revenues to which the Environmental Surcharge Billing Factors were applied in the
3 billing month during the last six-month period under review.

Expense Month	12-Month Average Revenues	Billing Month	Actual Revenues Subject to Environmental Surcharge Billing Factors
September 2024	\$120,821,401	November 2024	\$99,421,124
October 2024	\$121,311,018	December 2024	\$131,175,427
November 2024	\$121,389,783	January 2025	\$160,782,158
December 2024	\$122,472,782	February 2025	\$150,145,562
January 2025	\$123,876,347	March 2025	\$138,944,420
February 2025	\$124,988,605	April 2025	\$111,209,233
*The 12-month average revenues and the Actual Revenues subject to Environmental Surcharge Billing Factors reflect net revenues for Groups 1 and 2.			

4

5 Generally, an under-recovery will occur when actual revenues for the billing
6 month are less than the 12-month average revenues used for the expense month.
7 Likewise, an over-recovery will usually occur when actual revenues for the billing
8 month are greater than the 12-month average revenues used for the expense month.

9 **Q. What kind of adjustment is KU proposing in this case as a result of the operation**
10 **of the ECR Surcharge during the billing period?**

11 A. KU is proposing that the over-recovery be distributed over one month following the
12 Commission's Order in this proceeding. Specifically, KU recommends that the
13 Commission approve a decrease to the ECR Surcharge Revenue Requirement of
14 \$553,476 for one month beginning in the second full billing month following the
15 Commission's Order in this proceeding. This method is consistent with the method of

1 implementing previous over- or under-recovery positions in prior ECR Surcharge
2 review cases.

3 **Q. What is the bill impact on a residential customer for the proposed distribution of**
4 **the over-recovery?**

5 A. The inclusion of the distribution reflecting the over-recovery position in the
6 determination of the Environmental Surcharge Billing Factor will decrease the billing
7 factor by approximately 0.36% per month for one month. For a residential customer
8 using an average of 1,198 kWh per month (based on 12-month ended April 2025 data),
9 the impact of the adjusted Environmental Surcharge Billing Factor would be a decrease
10 of approximately \$0.51 for the month (using rates and adjustment clause factors in
11 effect for the July 2025 billing month). See the response and attachment to Commission
12 Staff's First Request for Information Question No. 7.

13 **Q. Is KU proposing to incorporate additional ECR Surcharge amounts into existing**
14 **base rates pursuant to KRS 278.183(3)?**

15 A. No, the Company does not believe it is necessary at this time to incorporate any
16 additional ECR Surcharge amounts into base rates. See the response to Commission
17 Staff's First Request for Information Question No. 6.

18 **Q. Why is KU not proposing to incorporate additional ECR Surcharge amounts into**
19 **existing base rates at this time?**

20 A. Pursuant to the Commission's final order in KU's last ECR Surcharge two-year review
21 proceeding, Case No. 2023-00376, the Company rolled \$42,304,190 into base rates for
22 a total amount of ECR Surcharge revenues included in base rates of \$74,085,745. New
23 base rates as a result of this roll-in took effect September 30, 2024. KU has not

1 experienced a significant increase in ECR Surcharge rate base or operating expenses
2 since that time and does not believe an incremental roll-in is necessary at this time. KU
3 has also seen an increase in revenues from the beneficial reuse sales of coal combustion
4 residuals, which decrease ECR Surcharge revenue requirements.

5 **Q. What rate of return is KU proposing to use for all ECR Compliance Plans upon**
6 **the Commission's Order in this proceeding?**

7 A. KU is recommending an overall rate of return on capital of 8.72%, including the
8 currently authorized 9.35% return on equity and adjusted capitalization, to be used to
9 calculate the return on environmental rate base in the monthly ES Reports. This rate
10 of return is based on capitalization as of February 28, 2025, the Commission's Order
11 of June 30, 2021 in Case No. 2020-00349 authorizing a 9.35% return on equity for all
12 ECR Compliance Plans, and the continued use of the federal corporate income tax rate
13 implemented in accordance with the Tax Cuts and Jobs Act and the Kentucky state
14 corporate income tax rate implemented in accordance with Kentucky House Bill 487.

15 See the response and attachment to Commission Staff's First Request for
16 Information Question No. 5.

17 **Q. What is your recommendation to the Commission in this case?**

18 A. KU makes the following recommendations to the Commission in this case:

- 19 a) The Commission should determine the ECR Surcharge amounts for the six-
20 month billing periods ending April 30, 2024, October 31, 2024, and the two-
21 year billing period ending April 30, 2025 to be just and reasonable;
- 22 b) The Commission should approve the proposed changes to the ES Forms;

1 c) The Commission should approve the proposed decrease to the ECR Surcharge
2 Revenue Requirement of \$553,476 for one month beginning in the second full
3 billing month following the Commission's Order in this proceeding;

4 d) The Commission should approve KU's proposal to not incorporate additional
5 ECR Surcharge costs into base rates; and

6 e) The Commission should approve the use of an overall rate of return on capital
7 of 8.72% for all projects, using a return on equity of 9.35%, beginning in the
8 second full billing month following the Commission's Order in this proceeding.

9 **Q. Does this conclude your testimony?**

10 A. Yes.

APPENDIX A

Andrea M. Fackler, CPA, CGMA

Manager, Revenue Requirement/Cost of Service
LG&E and KU Services Company
2701 Eastpoint Parkway
Louisville, Kentucky 40223

Professional Experience

LG&E and KU Services Company

Manager, Revenue Requirement/Cost of Service	Nov 2019 – Present
Rate & Regulatory Analyst III & Senior	Jan 2016 – Nov 2019
Accounting Analyst III & Senior	Aug 2012 – Jan 2016
Accounting Analyst II & III	Jul 2010 – Aug 2012

Dean Dorton Ford, PSC

Supervisor in Accounting and Compliance Services	Jan 2007 – May 2010
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Professional/Trade Memberships

Association of International Certified Professional Accountants
Kentucky Society of Certified Public Accountants
Institute of Management Accountants

Education/Certifications/Training

Bachelor of Science in Accounting, University of Kentucky, Dec 2006
Bachelor of Business Administration, University of Kentucky, Dec 2006
Certified Public Accountant License, Feb 2009
Chartered Global Management Accountant Designation, Jul 2014
LG&E and KU Strategic Business Integration, 2017-2018 Cohort

Civic Activities

Parent Volunteer, Budget Committee, St. John United Methodist Church, January 2021 – Present
President, PPL CARE Business Resource Group, January 2021 – Present
Committee Member, Harmony Elementary PTA, August 2020 – Present
Committee Member, Members in Business and Industry, KYCPA, July 2017 – Present
Troop Leader, Girl Scouts of Kentuckiana, September 2021 – September 2024
President-Elect, President, and Immediate Past President, LG&E and KU Young Energy Professionals Business Resource Group, 2015-2017

For the Month Ended:

	GROUP 2 (Net Revenues) - Kentucky Jurisdictional Revenues							
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Month	Non-fuel Base Rate Revenues	Base Rate Fuel Component	Fuel Clause Revenues Including Off-System Sales Tracker	DSM Revenues	Environmental Surcharge Revenues	Total (2)+(3)+(4)+(5)+(6)	Total Excluding Environmental Surcharge (7)-(6)	Total Non-Fuel Revenues plus DSM (2)+(5)
Average Monthly Jurisdictional Revenues, Excluding Environmental Surcharge and Fuel, for 12 Months Ending Current Expense Month.								
Average Kentucky Jurisdictional Revenues excluding Environmental Surcharge for 12-months ending with Current Month =								
GROUP 2 Revenues as a Percentage of Total Revenues for 12-months ending with the Current Month								

ES FORM 3.10

KENTUCKY UTILITIES COMPANY **ENVIRONMENTAL SURCHARGE REPORT**

Reconciliation of Reported Revenues

For the Month Ended:

	Revenues per Form 3.00	Revenues per Income Statement
Kentucky Retail Revenues		
(1) Base Rates (Customer Charge, Energy Charge, Demand Charge)		
(2) Fuel Adjustment Clause including Off System Sales Tracker		
(3) DSM		
(4) Environmental Surcharge		
(5) CSR Credits		
(6) EDR Credits		
(7) Business and Community Solar		
(8) Total Kentucky Jurisdictional Revenues for Environmental Surcharge Purposes =		
Non -Jurisdictional Revenues		
(9) Virginia Retail		
(10) Wholesale		
(11) InterSystem (Total Less Transmission Portion Booked in Account 447)		
(12) Total Non-Jurisdictional Revenues for Environmental Surcharge Purposes =		
(13) Total Company Revenues for Environmental Surcharge Purposes =		
(14) Jurisdictional Allocation Ratio for Current Month $[(8) / (13)] =$		
Reconciling Revenues		
(15) Brokered		
(16) InterSystem (Transmission Portion Booked in Account 447)		
(17) Unbilled		
(18) Provision for Refund		
(19) Miscellaneous		
(20) Total Company Revenues per Income Statement =		

For the Month Ended:

	GROUP 2 (Net Revenues) - Kentucky Jurisdictional Revenues								
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Month	Non-fuel Base Rate Revenues	Base Rate Fuel Component	Fuel Clause Revenues Including Off-System Sales Tracker and RPPA	DSM Revenues	Retired Asset Recovery Revenues	Environmental Surcharge Revenues	Total (2)+(3)+(4)+(5)+(6)+(7)	Total Excluding Environmental Surcharge (8)-(7)	Total Non-Fuel Revenues plus DSM and RAR (2)+(5)+(6)
Average Monthly Jurisdictional Revenues, Excluding Environmental Surcharge and Fuel, for 12 Months Ending Current Expense Month.									
Average Kentucky Jurisdictional Revenues excluding Environmental Surcharge for 12-months ending with Current Month = GROUP 2 Revenues as a Percentage of Total Revenues for 12-months ending with the Current Month									

ES FORM 3.10

KENTUCKY UTILITIES COMPANY **ENVIRONMENTAL SURCHARGE REPORT**

Reconciliation of Reported Revenues

For the Month Ended:

	Revenues per Form 3.00	Revenues per Income Statement
Kentucky Retail Revenues		
(1) Base Rates (Customer Charge, Energy Charge, Demand Charge)		
(2) Fuel Adjustment Clause including Off System Sales Tracker and RPPA		
(3) DSM		
(4) Retired Asset Recovery		
(5) Environmental Surcharge		
(6) CSR Credits		
(7) EDR Credits		
(8) Business and Community Solar		
(9) Total Kentucky Jurisdictional Revenues for Environmental Surcharge Purposes =		
Non -Jurisdictional Revenues		
(10) Virginia Retail		
(11) Wholesale		
(12) InterSystem (Total Less Transmission Portion Booked in Account 447)		
(13) Total Non-Jurisdictional Revenues for Environmental Surcharge Purposes =		
(14) Total Company Revenues for Environmental Surcharge Purposes =		
(15) Jurisdictional Allocation Ratio for Current Month $[(9) / (14)]$ =		
Reconciling Revenues		
(16) Brokered		
(17) InterSystem (Transmission Portion Booked in Account 447)		
(18) Unbilled		
(19) Provision for Refund		
(20) Miscellaneous		
(21) Total Company Revenues per Income Statement =		